

Ms. Bean,

I am writing on behalf of Ventura County Water Works District 1, 17 and 19, and the Lake Sherwood Community Services Districts (the four water works managed by Ventura County Department of Water and Sanitation). Below are five questions we are submitting in response to the current version of the draft emergency water regulations.

1. Please clarify the definition of “ornamental turf” as it applies to watering in medians. We have many locations that have landscaping, flowers, trees, bushes, etc. that is ornamental landscaping but may not be considered turf.
2. Is there any additional guidance on how to work within or outside the prop 218 process to address the reduction requirements?
3. We are in the process of submitting revised domestic consumption numbers that will impact our percentage reduction goals, how and when will we be notified of our new target?
4. There is some lag in getting actual consumption numbers vice the real time nature of production numbers. We had a conversation with Mark Emerson who informed us that we will be able to submit revised reports once we have actual consumption numbers (usually about a month later). Will this be written in the regulation?
5. We have a small (non-urban) water district that serves a large portion of our water to AG customers. It appears as though the regulation was written to allow Urban water suppliers to delete AG water in the calculations for reduction purposes, but we didn’t see any provisions for smaller water purveyors to delete AG water from the calculations. Can this be addressed?

Thank you for your consideration of these issues.

Regards,
Dave Sasek

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